

Leadership Policy: 'Governance', Check-and-Challenge and Accountability

Clarity Independent School

Bridge Barn Farm Woodhill Road Sandon CM2 7SG

Clarity Independent School is committed to safeguarding...

"Our school is committed to our whole-school approach to safeguarding, which ensures that keeping children safe is at the heart of everything we do, and underpins all systems, processes and policies...We promote an environment where children and young people feel empowered to raise concerns and report incidents and we work hard in partnership with pupils, parents and care-givers to keep children safe."

Clarity Safeguarding Policy September 2023

This is version [1] Written: 5th April 2023 Updated Date: Name: Debbie Hanson



Legislation and Statutory Guidance

Governing boards of maintained schools must have an instrument of government which sets out information about how the board is constituted. This requirement is set out in <u>The School Governance</u> (Constitution) (England) Regulations 2012, part 5, regulation 28.

However, for Independent Schools, there is no statutory requirement to have a Governing body, as stated in the Independent School Standards, which all Independent Schools are legally obliged to satisfy:

34. (1) The standard about the quality of leadership and management is met if the proprietor ensures that persons with leadership and management responsibilities at the school—

(a) demonstrate good skills and knowledge appropriate to their role so that the independent school standards are met consistently;
(b) fulfil their responsibilities effectively so that the independent school standards are met consistently; and
(c) actively promote the well-being of pupils.

(2) For the purposes of paragraph (1)(c) "well-being" means well-being within the meaning of section 10(2) of the Children Act 2004(**9**).

(Independent School Standards, www.legislation.gov.uk)

In addition, the Independent School Standards Guidance from the DfE, states, in Part 8: Quality of Leadership and Management of Schools, that:

"Section 94 of the Education and Skills Act 2008 requires that in addition to those matters covered by the standards described above [Parts 1-7], the Secretary of State must prescribe standards relating to the quality of leadership in and management of independent schools. As is the case with the other standards, **the approach behind this standard is to focus on required outcomes.** It is not the intention to tell schools how to govern or manage themselves – i.e. about how they are to go about achieving the required outcomes."

(Independent School Standards Guidance, www.assets.publishing.service.gov.uk)

The School agrees that the best standard of leadership is to focus on its impact through achieving the required outcomes, rather than judging the governance itself as the vehicle. Whilst intention and implementation are important, where are they without a successful, fruitful, impact, which is advantageous for all stakeholders?

The Proprietor of Clarity Independent School ('The School') recognises the importance of regular, cohesive, dynamic check-and-challenge of leadership, including of the HT herself, to ensure the highest quality service is provided for all users, and believes it is necessary to demonstrate rigorous accountability processes are in place.

The school's model for accountability is based on several legislative and guidance documents to ensure that all roles are provided for within the School's Governance, Check-and-Challenge and Accountability for Leadership Policy ('This Policy'):

- <u>Model instrument of government in Annex C of statutory guidance for maintained schools</u>, August 2017. DfE.
- The Education (Independent School Standards) Regulations 2014. Legislation.gov.uk.
- The Independent School Standards Guidance for Independent Schools, April 2019. DfE.

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- What Governing Boards Should Expect from Each Other, Updated 2022. National Governance Association (NGA).
- Governance Handbook, Academy Trusts and Maintained Schools, October 2020. DfE.
- The Competency Framework for Governance, January 2017. DfE.
- The Key Support for Leaders Documents (www.schoolleaders.thekeysupport.com):
 - Governing Boards Statutory Responsibilities, reviewed 11th October 2022.
 - Responsibilities of the Governing Board KeyDoc

Rationale

Getting governance right is important because of the significant impact it has on the quality of educational provision and the opportunity and life chances of children ('What Governors and HT should expect from each other,' National Governance Association, Updated 2022). The aim of a governing body, should a school have one, is to get governance right, by the HT and Governors working together, being mutually supportive and respecting each other's roles and responsibilities.

However, (considering the three elements of effective Governance which apply only to the Governors themselves as being satisfied where there is no governing board) there are five remaining elements to effective governance which are incorporated into the School's robust system for check-and-challenge of leadership to ensure effective accountability is in place.



Respective roles of governors and HT

A key aspect of governors (if a school has them) and HT's effective working relationship is respecting the difference between strategic governance and operational management.

- The governing board is expected to concentrate on delivering its core strategic functions.
- The headteacher is expected to implement the strategic priorities of the governing board through their day-to-day management of the school.

In Clarity Independent School, the challenge of not having a governing board, is that the HT as Proprietor, acts both similar to the governing body in strategic governance *and* by implementing the priorities through day-to-day operational management of the school. This is the reason why the School has four full time members of the Senior Leadership Team (SLT) who do not ordinarily teach routine lessons so that there is ample support for the HT in implementing the strategic priorities through all aspects of day-to-day management of the school.



Although this is a challenge, it allows the Proprietor to have strategic oversight of the school priorities and directional strategy, whilst being actively involved and having 'feet on the ground'. All too often, it is easy for leaders to simply forget what it is like to be running on the ground. There is a risk of over-ambitious, less relevant, contrary policies and procedures being put in place, or leaders simply having ineffective priorities to deliver the best outcomes specifically for the services users themselves, which are the pupils.

Aims

To provide alternative routes to achieve the same high-quality outcomes of accountability as traditional Governance would have in their core functions:

- Ensuring clarity of vision, ethos and strategic direction
- Holding executive leaders to account for the educational performance of the organisation and its pupils, and the effective and efficient performance management of staff
- Overseeing financial performance of the organisation and making sure its money is spent wisely

(The Key for Leaders, www.thekeysupport.com)

The HT as Proprietor of the company, meets the 5 remaining core elements of effective leadership stated in 'What Governing Boards and Head Teachers Should Expect From Each Other':

- Understanding roles and responsibilities
- Courageous conversations
- Knowing the school
- Asking challenging questions
- Good relationships based on trust

The HT and SLT team have set the School's ethos and vision, which flows into the school's mission statement and informs all of the School's Policies and procedures;

"To provide motivating, fun, tailormade education, at a level, pace and content specifically matched to meet the children's needs.

To address learning difficulties, not merely accept them as being static and final, rather to provide therapies and interventions, to heal, where possible, to develop improvements in the children's skills, to exceed expected progress and to lessen the impact that learning difficulties can have on the rest of their lives.

To provide a fresh start in learning, where it has previously not been possible.

To provide for the children's needs, to enable them to enjoy learning, love being here, and be excited to come to school each day."

Terminology

We use "Governors' in this document to mean governing bodies in local authority (LA) maintained schools and federations, trust boards in a single academy trust (SAT) and regional or academy level committees, sometimes called the local governing body.



We use 'Head Teacher' (HT) to mean those responsible for the overall management of a school, a federation of schools or an academy. This includes the HT of a single school and executive leader of a federation.

Governing is the overseeing of the control and direction of something, in this case, a school. Governing helps to always act in the best interest of the 'business', i.e. to improve the performance, increase the stability and productivity, unlock new opportunities, reduce risks and enable faster growth.

Core Values

The Proprietor agrees to:

- Be mindful that in exercising all their functions, they act with integrity, objectivity and honesty and in the best interests of the school
- Be open about the decisions they make and the actions they take
- Is prepared to explain their decisions and actions to interested parties.
- Be a role model regarding working with all parties involved in supporting the school, in accordance with 'The 7 principles of public life', as set out by Lord Nolan. These principles apply to anyone, locally and nationally, who is elected or appointed as a public office-holder. They are selflessness, integrity, objectivity, accountability, openness, honesty and leadership.
- Make all staff members of the school, and external parties coming to work in the school, aware of the Nolan Principles and requests that they adhere to them.

(The Constitution of Governing Bodies of Maintained Schools, p9 2017, www.gov.uk)

The Proprietor shall make sure they do not fall under any of the restrictions for Governors in which they shall be removed:

- bankruptcy restrictions order
- disqualification order or disqualification undertaking under the Company Directors Disqualification Act 1986; a disqualification order under the Companies (Northern Ireland) Order 2002; a disqualification undertaking accepted under the Company Directors Disqualification (Northern Ireland) Order 2002; or an order made under section 429(2)(b) of the Insolvency Act 1986 (failure to pay under county court administration order)
- has been removed from the office of trustee for a charity by an order made by the Charity Commission or Commissioners or High Court on grounds of any misconduct or mismanagement in the administration of the charity, or under section 34 of the Charities and Trustee Investment (Scotland) Act 2005 from being concerned in the management or control of any body.
- has been removed from office as an elected governor within the last five years.
- is included in the list of people considered by the Secretary of State as unsuitable to work with children or young people
- is barred from any regulated activity relating to children
- is subject to a direction of the Secretary of State under section 142 of the Education Act 2002 or section 128 of the Education and Skills Act 2008
- is disqualified from working with children or from registering for child-minding or providing day care
- is disqualified from being an independent school proprietor, teacher or employee by the Secretary of State

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- subject to certain exceptions for overseas offences that do not correlate with a UK offence, has been sentenced to three months or more in prison (without the option of a fine) in the five years ending with the date preceding the date of appointment/election as a governor or since becoming a governor
- subject to certain exceptions for overseas offences that do not correlate with a UK offence, has received a
 prison sentence of two and a half years or more in the 20 years ending with the date preceding the date of
 appointment/election as a governor
- subject to certain exceptions for overseas offences that do not correlate with a UK offence, has at any time received a prison sentence of five years or more
- has been convicted and fined for causing a nuisance or disturbance on school or educational premises during the five years ending with the date immediately preceding appointment/election or since appointment or election as a governor
- refuses a request by the clerk to make an application to the Disclosure And Barring Service for a criminal records certificate

(The constitution of governing bodies of maintained schools 2017, <u>www.gov.uk</u>)

Demonstrating Accountability and Check-and-Challenge Through External Professional Audits, Reports and Checklists

The School commissions the following audits / reports / checklists by external professionals and where possible, makes these available on the school website for stakeholders to view. Actions identified are put on action plans, and inform the school development plan, which is updated each year. Action plans are monitored by respective departments within the school half termly, and overseen by the HT.

- Safeguarding audit annually, internally generated, March -> ESCB and audit to be put on school website
- Safeguarding audit conducted by Essex County Council through monitoring visit, March 22 and November 22, usually annually (verbal feedback, no report generated)
- Accessibility Audit: Each three years, internally generated, audit to be put on school website
- Equality and Diversity Impact audit: Annually, internally generated, audit to be conducted and put on school website
- Curriculum Quality, teaching and learning, audit annually: *Martin Ayres, Lordenshaw Consultancy
- Behaviour management; policy, strategy, practice and records audit: *Joel Shaljean, Esset Trust
- Health and Safety annual audit: Peninsula Consultancy, audit to be put on school website
- Human Resources (HR) continual check-and-challenge of documentation, plus advice, training, consultancy and accountability: Peninsula HR Consultancy, (no report produced)
- Compliance over all issues (H+S, HR, Safeguarding, Behaviour management, Policies, Insurance etc.): *Markel Care Consultancy to produce written report of audit
- Compliance overall issues in preparation for inspection: *Independent Schools Association preinspection visit every three years. Visit to be scheduled (verbal feedback and actions will be given, no report will be generated)
- Annual audit of whole school against Independent School Standards (ISS) to form School development plan (SDP)

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- SDP: Martin Ayres, Lordenshaw Consultancy, SDP to school website
- School Action Plan to DfE
- SEND Meeting Needs on EHCPs: ECC Inclusion partners reports following monitoring and annual reviews, to be put on school website
- Data protection audit of disposal of documentation annually

*Intention in progress, not secured fully at time of writing

The following are external professional bodies the School uses for advice and consultancy in addition to the above:

- Safeguarding: ESCB briefings run weekly for advice on specific cases
- Early help forum: ESCB briefings run weekly for advice on specific cases
- Social Emotional Mental Health forum: ECC run weekly advice sessions to use where necessary
- Legal Advice and oversight: Solicitor Julia Green, Browne Jacobson LLP
- Inspection advice and consultancy regarding compliance, quality assurance and school development: Martin Ayres, Lordenshaw Consultancy
- Student wellbeing, mental health strategies and advice: Sus O'Sullivan, SOS Hollistics.
- Speech and Language Therapy, consultancy and advice: Clare Onyett, Speech and Language Therapist.
- Occupational Therapy, consultancy and advice: The Great Little OT Practice.
- EPHA (Essex Primary Headteachers' Association): Support, advice and networking with other HTs across Essex.
- Church of England NPQH course: Support, advice, training and accountability through successful completion of NPQH course.
- Networking with other HTs of small schools, SEND schools or Independent Schools to tap into knowledge and experience of other HTs.
- Independent Schools Association: member
- Independent Schools Council: member
- The Key Leaders Support: advice and guidance re regulations, policies and documentation
- Autism consultancy: The School seeks an Autism consultancy to provide advice and training where necessary. The School is implementing the *Autism Framework this school development year (March 23-24).
- Trauma Perceptive Practice: The HT has done extensive reading and research around trauma perceptive practice and is currently arranging whole-school training.
- Attachment Aware Practice: The HT has done extensive reading and research around attachment difficulties and best practice and conducted the Attachment Aware training towards the bronze award with Laura Dawson, Essex Virtual School, November 2020. Audit to be completed and put on website.



The following table represents the key responsibilities of a Governing board, and illustrates how the School conducts the same tasks, and promotes check-and-challenge by external professionals.



Responsibilities Within the School and Demonstrating Internal and External Accountability

(The Key: Responsibilities of the Governing Board, www.schoolleaders.thekeysupport.co.uk)

Role	Who conducts the task?	Who Monitors the task?	External accountability to
Admissions			
Review child's paperwork at panel meetings and relay to HT.	Deputy Head and SENDCO	Deputy, SENDCO and HT vote on School's ability to meet child's needs and final decision rests with HT if undecided.	HT liaises with Local Authority. LEA decides who to refer to the School. HT refers School's decision to offer place.
Reviews policy annually to ensure admission arrangements are fair, clear and objective.	HT	N/A	
Admissions register	Business Manager	HT	
Attendance register	Office Manager	Business Manager	Records sent to DfE in accordance with their requirements
Persistent absent register	SENDCO	HT	Attendance Officer at LEA and inspection by regulatory bodies and Local Authorities.
Behaviour and exclusions			
Ensure there is an effective, clear Behaviour Policy in place, setting high standards and challenging pupils to develop themselves	Deputy	HT	Essex Steps Tutor Joel Shaljean; training, certification of 3 members of SLT as Accredited Tutors, provides advice and consultancy, annual audit of behaviour records. Inspection by regulatory bodies and Local Authorities.



Promoting good behaviour and discipline	All staff and pupil role	Pupils: Teaching staff,	HT has 24/7 HR advice from Peninsula HR
	models	Deputy.	consultancy.
		Staff: HT as employer	
		through appraisals.	
		HT: SLT members	
		encouraged to check-and-	
		challenge her role	
		modelling of behaviour to	
		pupils and staff.	
Ensure school has anti-bullying strategy	Deputy, HT to check-and-	Deputy overseas and is	Parent voice: are pupils being bullied without
	challenge.	accountable to HT.	it being dealt with effectively and prevented?
	All staff and pupils	All teaching staff oversea	Children's voice: "Am I being bullied and is it
	responsible to	pupils' conduct and report	being dealt with effectively and prevented?"
	implement day to day,	to Deputy.	
	observe and report.		
Arrange suitable full-time education for child	HT supported by	N/A	LEA as service users
out of school 5+ days	SENDCO		Parents
			Pupil feedback
Decision about when to terminate a	SENDCO, Deputy, HT and	HT	LEA as service users through liaison and
placement	at least one member of		discussion of needs / continued suitability of
	teaching staff		placement
	collaboratively		
Curriculum			
Ensure enough teaching time is allocated to	Deputy and subject leads	HT	Parent voice,
subjects			Pupil voice,
Ensure curriculum is broad and balanced	Deputy and subject leads	HT	LEA as service user,
			Curriculum consultancy through annual audits



			and training
Ensure the school has an up to date policy for relationships education, or RSE for secondary and consults parents when reviewed or changed	Deputy	HT	Inspection by regulatory bodies and LEAs
Ensure pupils y8-13 are provided with independent careers guidance and that there is a range of education and training providers accessible to all pupils y8-13 to inform them about technical educational qualifications and apprenticeships (pupils will have 2 experiences by the end of KS3, another 2 by the end of KS4 and a further 2 by the end of KS5, totalling 6 experiences as per DfE guidance).	Deputy as Careers Lead	HT	Careers advisor Directions, LEA as service user, Inspection by regulatory bodies and LEAs
Finance			
Comply with company law Prepare the company's annual financial statement	Business manager Business manager to prepare accounts	HT as Proprietor HT to sign off	Accountant Graham McGhee as Chartered Accountant. Companies House compliancy through annual audit.
Share company financial information with LEA annually, including per pupil allocation of fees and uplift requests for fees	Business manager to prepare accounts	HT to monitor	HT to liaise with LEA, LEA to approve accounts per pupil and use of school funds if continuing the child's placement at the school.
Set appropriate and cost-effective budget	Business manager	HT	
Ensure the school has adequate insurance	Business manager	HT	Markel Consultancy conduct an annual audit to ensure compliance and set required actions the school must comply with



Ensure pupil premium funding equivalent is spent on pupils in need	Deputy	HT	Pupil's needs are met in accordance to money spent. Parent voice, LEA satisfaction that money is spent as needed in end of year financial records to LEA.
Ensure all policies and documents are in place and reviewed according to the school's review cycle	HT	HT: check-and-challenge by the Deputy and SENDCO for missing / out of date policies	LEA, Regulatory bodies, Parents, Smooth running of the school.
Parents and the community			
Ensure all information necessary is published on the school's website Ensure 'Get Information About Schools' is up to date Ensure suitable complaints procedure policy is in place and implemented effectively	School supporter, Business manager + HT Business Manager HT	HT HT	Members of the public feedback, Annual review of website's effectivity with parents. DfE DfE, LEA feedback, Inspection by regulatory bodies
Ensure compliance with Freedom of Information Act and ICO re SARs Data protection act 2018 and GDPR	HT and business manager Business manager	нт	ICO, Inspection by regulatory bodies Members of the public and parent feedback ICO, Inspection by regulatory bodies
compliance Health and Safety			
Health and Safety Policy, making sure school meeting its legal responsibilities Ensuring compliance with Health and Safety	HT School supporter	HT	Peninsula Health and Safety Consultancy Annual Audit by Peninsula published on school website,
at Work etc. Act 1974 Ensuring compliance with Regulatory Reform	Business manager	HT	LEA



(Fire Safety) Order 2005			
Ensuring compliance with health and safety requirements set by the LA	School supporter	HT	
Implementing H+S checks and daily routines	School supporter, All staff responsible for conducting themselves safely and keeping pupils safe	HT	
Pupil Wellbeing			
Ensure a staff code of conduct (handbook)	HT as employer		Peninsula as HR consultancy through annual audit of company documentation
Designated person to promote LAC children's progress	Deputy	HT	LEA, ESCB audit every two years published for stakeholders to view on website. Annual PEP meetings for each LAC pupil in collaboration with the Virtual School, Social care, any other professionals involved and families.
Ensure school complies with Equality Act and Public Sector Equality Duty (PSED) and progress achieved is published	HT		Equality annual audit published for stakeholders to view on website
Policy on supporting pupils with medical needs	HT		Inspection by regulatory bodies LEA monitoring
Implementation of the Policy on supporting pupils with medical needs	First aiders (all teaching staff), Emergency first aiders in the workplace (Staff first	HT	Markel Consultancy through annual audit, Health and Safety England



	aiders) DH, RC and SA.		
Records for the above	School office,	HT	
	Teaching staff		
	conducting first aid		
Compliance with food standards	Business manager	HT	
Safeguarding			
Ensure compliance with statutory guidance	DSL	N/A	ESCB through referrals and weekly advice
on safeguarding KCSIE and updates re			forum
procedures and practice of the LEA, as part	DDSLs	DSL	
of inter-agency safeguarding procedures set			
up by your safeguarding partners: Local authority (LEA), Integrated Care Boards			
(previously known as the clinical			
commissioning group) within the LEA, Chief			
officer of police within the LEA			
Effective child protection policy in place	DSL	DDSL	Essex LEA through model policy and
		HT to sign off	monitoring. Inspection by regulatory bodies.
Ensure staff compliance with safeguarding	All peers, whistleblowing	HT	LADO
procedures, allegations addressed	procedures.	If concerns re HT any staff	
immediately		member goes directly to	
	lf re HT ->	LADO	
Support for any staff member facing an	HT	N/A	N/A
allegation	Staff peer to mentor and		
	support		
Allegations against other children	DSL / DDSLs	DSL	ESCB
SEND			



Co-operate with LEA in delivering their local offer	HT	N/A	LEA feedback
Making sure pupils with SEND get the support they need, making sure they are each included in all activities.	Class teachers and support staff. Occupational Therapist SALT Wellbeing Therapist SET CAMHS	SENDCO, reports to HT	LEA Inclusion partners, feedback reports following monitoring and Annual Reviews. Parent feedback and target tracking at termly One Plan reviews and Annual Reviews. Specialists feedback children's progress via individual reports, and give advice, training and consultancy.
Keeping parents informed of the SEND provision for their young person	Class teachers, supported by support staff during daily / weekly wellbeing calls / emails, at termly One Plan review meetings, Annual Reviews and end of year reports.	SENDCO, reports to HT End of year reports – Deputy, reports to HT	LEA Inclusion partners. Parent satisfaction. SEND Report annually. SEND Policy updated annually.
Ensuring arrangements are made to support pupils with medical needs.	HT – Policy. Teaching and support staff (all first aiders) to administer first aid, medications and put actions on children's IHCP plans into place. School supporter to support re H+S and adaptations needed.	HT and Deputy	Accessibility audit every 3 years, School nurse team, NHS 111 and A and E, SET CAMHS, Parent feedback, First Aid training contacts at Prospero Training for advice and training. Markel Care Consultancy in annual audit. Peninsula H+S annual audit.



	Office to record on		
	Arbor.		
Identifying and responding to SEND	Teaching and support	SENDCO, reports to HT	
	staff,		Annual SEND Report,
	Occupational Therapist,		Accessibility audit,
	SALT,		Parent satisfaction,
	Wellbeing Therapist,		SEND audit,
	SET CAMHS,		LEA monitoring and Inclusion Partner
	HT cognitive		feedback,
	assessments		Inspection by regulatory bodies,
Record accurately and keep up to date the	SENDCO - School's SEND	Reports to HT	
provision made for SEND	provision map		
Make sure the school publishes its SEND	SENDCO SEND	HT	
information report online	Information Report		
Publish information about the arrangements	SENDCO SEND	HT	Members of the Public,
for the admission of pupils with disabilities,	Information Report and		SEND Information Report and Accessibility
the steps taken to prevent them being	Accessibility Plan		Plan, Parent satisfaction, Inspection by
treated less favourably than others, the			regulatory bodies
facilities provided to assist access, and their			
accessibility plans			
Make sure there is a qualified teacher as	SENDCO is qualified	HT	
SENDCO	teacher and has SENDCO		
	M level qualification		LEA monitoring,
Determine the SENDCO's approach to using	SENDCO, monitored by	HT	Inclusion Partners at LEA,
their resources to support the progress of	the Deputy		Inspection by regulatory bodies
pupils with SEND			
Person or committee having oversight for	SENDCO supported by	HT	



the school's arrangements for SEND	class teachers, support		
	staff, Deputy and HT		-
Make sure the school follows the statutory	SENDCO	HT	
SEND code of practice			
Staffing and Safer Recruitment			
Establish a panel to appoint the HT or Deputy	HT is Proprietor of the	HT appoints Deputy and	Since the Proprietor of the company is the
where necessary	company so cannot be	SENDCO with aid of	company owner and has a strong invested
	appointed as she	Deputy / SENDCO as	interest in it succeeding, responsibility for its
	initiated the company.	appropriate	success rests with the Proprietor to do
	HT is employed by the		everything to the highest standards possible to
	company as Director		ensure it succeeds. The Proprietor of a
	hence why she makes		company will have the strongest interest in the
	herself accountable to		school's success due to the passion which
	Deputy and SENDCO.		initiated the school, and the high stakes
			involved.
Ensure safer recruiting procedures are	HT supported by	HT	
applied and Single Central Record is being	Business Manager and		
monitored	Office staff		Inspection by regulatory bodies
Make sure at least one person on any	HT has done this training	HT	Thispection by regulatory bodies
appointment panel has done safer	(Sept 22), Business		
recruitment training	Manager (April 23)		
Ensure gender pay gap information is	Business Manager but	HT but N/A currently	Members of the public
published where applicable (where 250+	N/A currently		Inspection by regulatory bodies
employees)			
Pay and Appraisal			
Take account of employment law and	HT and Business	HT	Peninsula HR consultancy



guidance	Manager		
The following responsibilities are not require	d by Governors for academi	es and free schools (in addit	ion, Independent Schools are not required to
have Governors at all); however, further info	rmation is provided below t	o illustrate how the School o	lemonstrates its accountability.
Review and approve a pay policy which sits	Business Manager to	Proprietor	Private company decisions made to ensure
within the budget, make recommendation	ensure HT's pay sits		security and success of the company as it is not
on the HT's pay	within the annual		obliged to follow the School Teachers' Pay and
	budget, discussed with		Conditions Document
	HT with company		
	security and company		
	durability in mind		
Determine the appraisal period that applies	HT and Business	HT	Peninsula HR Consultancy
to teachers and adopt a document that sets	Manager, mini appraisals		
out the appraisal process for teachers (and	conducted termly by HT,		
support staff)	annual full appraisal by		
	НТ		
Ensure the HT carries out their duties in	HT to conduct these	N/A	Peninsula HR consultancy
appraising other teachers including	supported by Business		
recommendations on their pay	Manager and Deputy		
Appoint an external advisor for advice and	The HT conducts self-	HT conducts audits in all	HT is studying the NPQH National Professional
support on the HT's appraisal, inform the HT	reflections against the	areas of the school, with	Qualification of Headship and is accountable to
of the standards against which their	HT standards, and	the support from external	the course providers for successful completion
performance will be assessed, set objectives	Independent School	professionals, to ensure	
for the HT and appraise them against the	Standards as a reflective	robust check-and-	
standards and objectives	practitioner.	challenge takes place so	
	The HT is also the	that she is accountable.	
	Proprietor of the	The HT receives feedback	
	company; therefore, has	from the staff team via	



a spirited interest in the	SWOT analysis, during	
school succeeding and in	their appraisals, annual	
providing highest	staff questionnaire	
standards to ensure	feedback forms, and the	
security and longevity of	annual whole school self-	
the school and company.	reflection.	

Monitoring arrangements for this policy

This policy will be reviewed by the Proprietor annually, with contributions from the Senior Leadership Team (SLT).